

**REMARKS**

Applicants' undersigned attorney thanks the Examiner for his comments. Applicants respectfully request reconsideration of this patent application, particularly in view of the above Amendment and the following remarks. Currently, Claims 54-73 are pending.

**Amendment to the Claims**

Claims 54-73 have been examined, with no claims being allowed. Applicants have amended Claim 54 to include the limitation of the substantially individualized, dried fibers being non-crosslinked. Support for this limitation is provided throughout the application, such as at page 2, lines 5-7, and at page 8, lines 5-8.

No new matter has been added by this Amendment. No additional fee is required because the number of independent claims remains unchanged and the total number of claims also remains unchanged.

**Claim Rejections - 35 U.S.C. §103**

The rejection of Claims 54-73 under 35 U.S.C. §103(a) as being unpatentable over Naieni et al. (U.S. Patent No. 5,484,896) or Dutkiewicz et al. (U.S. Patent No. 5,834,095) in view of Moore et al. (European Patent No. 0 252 650) is respectfully traversed.

As pointed out by the Examiner, Naieni et al., Dutkiewicz et al., and Moore et al. each disclose crosslinked cellulose fibers. Applicants' invention, as recited in amended independent Claim 1, is directed to a cellulosic, fibrous material including substantially individualized, non-crosslinked, dried fibers. Applicants have discovered that fibers can be modified using thermal drying technologies, such as flash drying with drying aids to produce three-dimensional coiled fibers, instead of using a chemical cross-linker, and that the resulting fibers have remarkable absorbency, bulk, softness, and compressibility.

To establish a prima facie case of obviousness, there must be some suggestion or motivation, either in the references themselves or in the knowledge

generally available to one of ordinary skill in the art to modify the reference or combine reference teachings. There is no suggestion or motivation in any of the cited references, alone or in any combination, to modify the teachings therein to achieve *non-crosslinked* cellulose fibers. Because all three cited references rely on crosslinked cellulose fibers to achieve the desired attributes of the respective fibers, there is no reasonable expectation for any combination of the cited references to result in Applicants' cellulosic, fibrous material that specifically includes non-crosslinked fibers. None of the three cited references discloses or suggests non-crosslinked fibers.

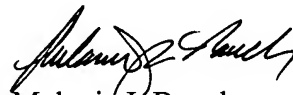
Furthermore, Dutkiewicz et al. disclose cellulosic fibers having a water retention value that is less than about 1.0. Thus, Dutkiewicz et al. clearly teach away from Applicants' invention as recited in Claims 55 and 58.

For at least the reasons given above, Applicants respectfully submit that the teachings of Naieni et al. or Dutkiewicz et al. in view of Moore et al. fail to disclose or suggest Applicants' claimed invention. Accordingly, reconsideration and withdrawal of this rejection is respectfully requested.

### Conclusion

Applicants believe that this case is now in condition for allowance. If the Examiner feels that any issues remain, then Applicants' undersigned attorney would like to discuss the case with the Examiner. The undersigned can be reached at (847) 490-1400.

Respectfully submitted,



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